

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,
ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS,
ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA,
ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

Civil Action No. 2:21-CV-00022-Z

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC..
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PARENTHOOD SOUTH TEXAS,
INC., PLANNED PARENTHOOD
CAMERON COUNTY, INC.,
PLANNED PARENTHOOD SAN
ANTONIO, INC.,

Defendants.

**PARTIES' JOINT MOTION FOR ENTRY OF STIPULATION AND PROPOSED
ORDER REGARDING THE PRODUCTION OF ELECTRONICALLY STORED
INFORMATION AND HARD COPY DOCUMENTS**

The State of Texas and Relator Alex Doe (“Plaintiffs”) and Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc. (“Defendants”), jointly move the

Court for entry of an Order regarding the production of electronically stored information and hard copy documents. The parties agree that entry of this Order will allow for this discovery to proceed in an expeditious and efficient manner.

WHEREFORE, the Parties respectfully request that their Stipulation and Joint Proposed Order be entered in this matter.

Dated: July 22, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was filed electronically via CM/ECF on July 20, 2022, causing electronic service on all counsel of record.

/s/ Tirzah S. Lollar
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